

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-11803-MLW

SHENIA DANCY-STEWART as
Administratrix of the Estate
of EVELINE BARROS-CEPEDA,
MARIA DaROSA, and LUIS
CARVALHO,
Plaintiffs,

v.

THOMAS TAYLOR, Jr., and the
CITY OF BOSTON,
Defendants.

**DEFENDANT CITY OF BOSTON'S ASSENTED-TO MOTION
TO ENLARGE TIME TO FILE RESPONSIVE PLEADINGS
PURSUANT TO FED.R.CIV.P. 6(B).**

NOW COMES the Defendant, City of Boston, who respectfully moves this Honorable Court pursuant to Fed. R. Civ. P. 6(b) for an extension of time to file a responsive pleading. As grounds for this motion, the Defendant, City of Boston, states that:

1. The Plaintiffs have assented to the Defendant, City of Boston's, request for more time to file responsive pleadings (Rule 7.1 certification included below);
2. Undersigned counsel requires additional time to investigate the Complaint and draft responsive pleadings;
3. The Defendant, City of Boston, requests an extension until October 21, 2005, to file a responsive pleading to Plaintiffs' Complaint; and,

4. Allowing this motion will not prejudice any party to the action and permitting the Defendant, City of Boston, an extension to file a responsive pleading to Plaintiffs' Complaint will further the interests of justice.

WHEREFORE, the Defendant, City of Boston, respectfully requests that this Honorable Court allow its motion to extend time to file responsive pleadings, and set the date for filing of responsive pleadings on or before October 21, 2005.

Respectfully submitted,

DEFENDANT CITY OF BOSTON,

CERTIFICATE OF SERVICE

I hereby certify that on this day, a copy of this document was served upon counsel of record for the Plaintiffs via U.S. Mail to Law Office of Andrew Stockwell-Alpert, 11 Beacon Street, Suite 1210, Boston, MA 02108/ Manuel R. Pires, 1212 Hancock Street, Quincy, MA 02169

9/24/05 /s/ Kate Cook
Date

Merita A. Hopkins
Corporation Counsel

By its attorneys:

/S/ Kate Cook
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7.1 Certification

Undersigned counsel certifies that on September 23, 2005, pursuant to LR, D. Mass. 7.1(a)(2), she spoke with Plaintiffs' counsel, Andrew Stockwell Esq., and Manuel R. Pires who assented to the Defendant City of Boston's request for more time to file responsive pleadings.

Date: 9/23/05

/s/ Kate Cook
Kate Cook, Esq.